

ASK LLP
Edward E. Neiger
Jennifer A. Christian
151 West 46th Street, 4th Floor
New York, New York 10036
Tel.: (212) 267-7342
Fax: (212) 918-3427
Email: eneiger@askllp.com
jchristian@askllp.com

*Co-Counsel for Ad Hoc Group of Individual Victims
of Purdue Pharma L.P., et al.*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In re: : Chapter 11
:
PURDUE PHARMA L.P., *et al.*, : Case No. 19-23649-RDD
: (Jointly Administered)
Debtors.¹ :
-----X

**AMENDED VERIFIED STATEMENT OF THE AD HOC GROUP
OF INDIVIDUAL VICTIMS OF PURDUE PHARMA L.P., *ET AL.*,
PURSUANT TO BANKRUPTCY RULE 2019**

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), the Ad Hoc Group of Individual Victims of Purdue Pharma L.P. (the “Ad Hoc Group”) holding general unsecured claims in the above-captioned chapter 11 cases of Purdue Pharma L.P., *et al.* (collectively, the “Debtors”), hereby submits this amended verified statement (the “Amended Verified Statement”) to disclose the (i) retention of co-counsel, (ii) addition of six members to the Ad Hoc Group, and (iii) resignation of one member of the Ad Hoc Group since the Ad Hoc Group

¹ The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

filed its initial Verified Statement on October 25, 2019 (the “Verified Statement”). [Dkt. No. 348]

In support thereof, the Ad Hoc Group states:

1. Subsequent to the filing of the Ad Hoc Group’s Verified Statement, the Ad Hoc Group retained the law firm of White & Case LLP (“White & Case”) as co-counsel. White & Case filed its Notice of Appearance on April 17, 2020. [Dkt. No. 1058]

2. The Ad Hoc Group has also expanded to include six new members: Nicholas Boatman, Chad Sabora, Sharon Murillo, Julie Strickler, Claire Rudy Foster, and Tiffinee Scott. The reconstituted Ad Hoc Group has thirteen members. The current composition of the Ad Hoc Group is as follows:

- **Kathleen (“Kay”) Scarpone.** Kay’s son, Sgt. Joseph Scarpone, served in the United States Marine Corps from 2007 to 2011 and had a one-year tour in Afghanistan during that time. A combination of PTSD and opioid use led to his death in 2015. Kay serves on the Board of Directors of Team Sharing, Inc., a national nonprofit organization dedicated to parents who have lost a child to Substance Abuse Disorder (“SUD”). Team Sharing provides grief services, advocacy, community activism and a benevolence program for those in need of burial services. Team Sharing was instrumental in obtaining the proclamation of August 31 as National Overdose Awareness Day. Kay has traveled to Washington DC to meet with the Interim Director of the Drug Enforcement Administration to share her concerns with respect to furthering education regarding substance abuse for our youth.
- **Robert F. List, Esq.** Robert F. List, Esq. served as the 24th Governor of Nevada from 1979 to 1983. Prior to being elected Governor, he served for eight years as the elected Attorney General of Nevada, following his service as the District Attorney of Carson City. He was Chairman of both the Western Governors’ Association and the Conference of Western Attorneys General and served as President of the Nevada District Attorneys Association. Governor List is Of Counsel at Jolley Urga Woodbury & Holthus, where he focuses on public policy and government relations for corporate and business clients on the federal, state, and local levels. He has served as a Presidential or Cabinet Member appointee to boards and commissions under six U.S. Presidents. Governor List is an advocate for victims of the opioid epidemic. He serves as an advisory board member of The Recovery Advocacy Project and he is also affiliated with the Nevada Recovery PAC, The Foundation for Recovery, and Hope for Prisoners. In 2019, he was designated as a Distinguished Nevadan by the Board of Regents of the University of Nevada, the University System’s highest honor. Governor List received his B.S. degree from Utah State University and his Juris Doctor degree from the University of California, Hastings College of the Law. Governor List serves as an agent for individual victims of Purdue who have elected to remain anonymous. Anonymity is widely recognized as an important component of the right to privacy of those in addiction.

- **Jill Cichowicz.** Jill lost her twin brother, Scott, to an accidental overdose in February 2017. Scott was prescribed OxyContin in connection with a back injury he sustained in 2014 and he became addicted immediately. Scott entered treatment, but he relapsed after he was released. Jill founded The Scott Zebrowski Scholarship Fund at the McShin Foundation to help those suffering from SUD to receive services that they could not afford otherwise. The Fund recently won the Richmond Times Dispatch Best Charity of 2019. The Fund hosts monthly events to give back to the community, such as serving dinner to individuals in recovery at The Healing Place, volunteering at the Chesterfield Food Bank, mentoring the women in the HARP Program at the Chesterfield County Jail, and collecting items for those in recovery. Jill also educates others through the website www.anightforscott.com.
- **Diana (“Dede”) Yoder.** Dede was a single mom who raised her only child, Chris, in suburban New York. Chris loved extreme sports such as snowboarding, skateboarding, downhill mountain biking and more. As a result of such sports, Chris had several knee injuries which led to surgeries when he was 14 years old, followed by an emergency appendectomy when he was 15. His doctors prescribed opioid painkillers after each operation and Chris became addicted. Eventually, Chris attempted rehab, enrolling in 8 different programs over 4 years. In 2017, however, after a year of being in recovery, Chris relapsed and died. He was 21 years old. Dede received the call that her son had passed away while in Paris on business. It took her 9 hours to fly home to arrange the funeral for her only child. Dede is currently an Ambassador for Shatterproof, a national nonprofit organization dedicated to ending the devastation that opioid addiction causes families. Shatterproof works on policy change, new federal legislation, programs that educate and empower families, workplaces, and the general public, evidence-based standards of care for addiction, and initiatives to drive payment reform and accountability.
- **Garrett Hade.** Garrett was prescribed OxyContin at the age of 18 for minor injuries sustained while skateboarding. He became addicted to these pills and his addiction impacted his life for more than 10 years. Garrett found recovery in 2015. After losing multiple friends to drug overdoses around that same time, Garrett became involved in recovery advocacy. He is a founding member of The Voices Project, a non-profit organization dedicated to shattering the stigma associated with addiction and empowering others to share their own stories. Garrett has spent the last few years traveling around the country visiting communities affected by the disease of addiction. He visits prisons, jails, hospitals and treatment centers, and he advocates for better access to care, ethical standards in the treatment industry, criminal justice reform, and access to life saving medications. Garrett is also dedicated to advocating and advancing policy reforms for the treatment of SUD, helping to pass both state and federal laws that protect people who have suffered from opiate addiction. The Voices Project reaches over one million people per week.
- **Will Allphin.** Will worked in the aerospace industry as a Process/MFG/Quality Engineer and Audit liaison for several aerospace manufacturers. He has worked with the United States Department of Defense, Boeing, Lockheed Martin and Learjet, among others, to ensure procedural/specification compliance. Will was prescribed OxyContin in connection with back injuries he sustained. What began as dependence, ended with the loss of jobs, family and nearly the loss of his life through overdose. There was a point when Will was spending upwards of \$800 a day on his OxyContin addiction. Fortunately, Will has sustained recovery.

He changed the focus of his life's work towards the SUD and recovery fields based on his desire to give back after having lost more than 20 friends in a period of a just a few years to the opioid crisis. Will is currently the Director of Programs for the Foundation for Recovery in Las Vegas, NV. The Foundation's mission is to foster a safe and supportive environment for peer-centered education, services and engagement. Its programs and partnerships open pathways to recovery by removing social barriers and creating opportunities for those seeking and maintaining long-term recovery.

- **Lindsey Arrington.** Lindsey was first introduced to OxyContin as a minor and she became addicted. After enrolling in numerous treatment facilities, having her son taken away from her by child protective services, and almost losing her life, she was able to recover and she has been in recovery for eight years. In 2013, Lindsey founded Hope Soldiers, a non-profit organization based in Everett, Washington, whose mission is to help individuals and families affected by the OxyContin epidemic. Hope Soldiers' efforts have been featured in the national media and on MTV and were formally recognized by the White House.
- **Nicholas Boatman.** Nick is the President/Chairman of the Board at Discovery Institute in Marlboro, NJ. Nick is a person in recovery and has been with Discovery since 2017. With Nick's leadership, Discovery has implemented innovative evidence-based clinical programming, expanded community outreach to a national level, launched several scholarship campaigns, and made access to treatment more accessible to the surrounding community. Nick is also the co-founder and Chief Marketing Officer of Sana Lake Recovery based in St. Louis, MO. Nick is always striving to maintain engaged and compassionate team members who will ensure each client has the greatest opportunity at achieving success in long term recovery.
- **Sharon R. Murillo.** Sharon is the Chief Executive Officer and President of Serve You RX, a full-service pharmacy solutions provider based in Milwaukee, Wisconsin that specializes in pharmacy benefit management, mail order services, and specialty medication management. Serve You Rx is a major sponsor of Mobilize Recovery, a project of the Facebook Community Leadership Program, provided in partnership with The Voices Project. Mobilize Recovery aims to equip a network of emerging leaders from across the country with tools, training, and a plan of action that will launch nationwide to inspire recovery and end the preventable overdose crisis in America. Mobilize Recovery's network of future changemakers includes representation from each state and is comprised of more than 150 individuals who were selected from nearly 1,000 applicants.
- **Chad Sabora.** Chad is a person in recovery from substance use disorder and due to his unique experience as a prosecutor and former addict, he left the legal field to pursue drug policy reform advocacy. Chad is the Co-Founder/Chief Development Officer for the Sana Lake Recovery Center, Co-Founder/Executive Director of the Missouri Network for Opiate Reform and Recovery, Co-Founder of Mo Safe (syringe access for everyone) Project, Co-Founder/Board President of Rebel Recovery, on the Board of Directors of the Discovery Institute for Addictive Disorders and Owner/Managing Partner of Mo Better Living.

- **Julie Strickler.** Julie lost her 24-year old son, Nicholas, a Corporal in the U.S.M.C., to an overdose in 2017. Julie has been a committee member on a project to create a public education program on opioids, the Berks Opioid Task Force (SOS – Stop Overdoses, Save Lives), and on the international task force, “Do the Portugal Flip,” to flip addiction out of the criminal justice system and into the primary care system. Julie is a Certified Family Recovery Specialist (“CFRS”). CFRSs work with families who have loved ones in active addiction or recovery and families who have lost a loved one to the disease. Additionally, Fox Studios flew Julie out to Los Angeles to speak on a panel with the U.S. Surgeon General, Dr. Jerome Adams, where she shared her family’s story with the executives, directors, and attorneys of Fox Studios. Julie played a role in the movie and Broadway production of “Sno Babies,” the true story of two teenage girls living on the Mainline of Philadelphia who became addicted to opioids. Julie has also spoken before the U.S. Senate, provided local TV interviews, and written articles regarding the opioid epidemic. Mark Zuckerberg’s film crew created a short documentary on Nicholas’ opioid journey.
- **Claire Rudy Foster (“Foster”).** Foster was prescribed OxyContin for pain following a dental procedure when he was 17 years old. He became addicted, suffering his first near-fatal overdose in February 2002, days after his 18th birthday. Foster struggled with opioid addiction for the next five years, losing jobs, housing, relationships, and opportunities due to his addiction. Foster is in recovery from opioid addiction. His contributions to the recovery movement include co-authoring a book on the opioid addiction crisis and how to end it. He has also written speeches, letters, and articles supporting equal rights for people with SUD, some of which can be found in the Library of Congress and have been read on the floor of the U.S. Senate. Foster developed, wrote, and hosted two seasons of a leading recovery podcast called “Addiction Unscripted,” described as “This American Life” for people with SUD. His writing about recovery has gone viral in *The Huffington Post*.
- **Tiffinee Scott.** Tiffinee lost her daughter due to complications from sickle cell disease and prescription medication, along with complex somatic health concerns surrounding opioids. Tiffinee is a Certified Peer Recovery Specialist, advocate, and trainer for Peer Recovery Support Services for CCAR Recovery Coach Academy, Forensic Peer Support, Wellness Recovery Action Plan, Family Peer Support, and Overdose Prevention, among others. In addition, Tiffinee is an active member of the Maryland Addiction and Behavioral Health Professional Certification Board, the National Association for Addiction Professionals, Copeland Center for Wellness and Recovery, the National Association of Drug Court Professionals, National Council of NCADD Think Tank for Peer Recovery Services, National Alliance on Mental Illness, Recovery Action Project and founder of the Maryland Peer Advisory Council. She is the Maryland Lead for Mobilize Recovery. Tiffinee has spoken at conferences, honored as Maryland Advocate of the Year, and received a Governor’s citation which focused on her recovery community efforts.

3. The members of the Ad Hoc Group hold claims against the Debtors’ estates.²

² The Ad Hoc Group members are individuals who have been injured by the Debtors’ opioid products.

4. Additionally, since filing the Verified Statement, Fred Muench resigned from the Ad Hoc Group.

5. In accordance with Bankruptcy Rule 2019, a list of the names, addresses and the nature and amount of all disclosable economic interests held in respect of the Debtors by each member of the Ad Hoc Group is attached hereto as **Exhibit A**. The information set forth on **Exhibit A** is based on information provided by the members of the Ad Hoc Group and is intended to comply with Bankruptcy Rule 2019 and is not intended for any other purpose. The members of the Ad Hoc Group make no representation with respect to the amount, allowance, validity, secured status, or priority of such claims and reserve all rights with respect thereto.

6. Nothing contained in this Statement (or **Exhibit A** hereto) should be construed as a limitation upon, or waiver, of any Ad Hoc Group member's right to assert, file, and/or amend its claim(s) in accordance with applicable law and any orders entered in these cases establishing procedures for filing proofs of claim.

7. The Ad Hoc Group reserves the right to amend and/or supplement this Amended Verified Statement in accordance with Bankruptcy Rule 2019.

Dated: July 21, 2020
New York, New York

ASK LLP

/s/ Edward E. Neiger
Edward E. Neiger, Esq.
Jennifer A. Christian, Esq.
151 W. 46th Street, 4th Floor
New York, New York 10036
Tel.: (212) 267-7342
Fax: (212) 918-3427
Email: eneiger@askllp.com
jchristian@askllp.com

*Co-Counsel for Ad Hoc Group of Individual
Victims of Purdue Pharma L.P., et al.*